

## *EXHIBIT B*

Joseph L. Grant  
May 31, 2019

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1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE DISTRICT OF NEBRASKA

3           RYSTA LEONA SUSMAN, BOTH  
4           INDIVIDUALLY AND AS LEGAL  
5           GUARDIAN OF SHANE ALLEN  
6           LOVELAND; AND JACOB SUMMERS,

7                 Plaintiff,

8                 vs.

CASE NO. 8:18CV127

9           THE GOODYEAR TIRE & RUBBER  
10          COMPANY,

11          Defendant.

12          DEPOSITION OF:           JOSEPH L. GRANT  
13          DATE:                   May 31, 2019  
14          TIME:                  9:00 a.m.  
15          LOCATION:             A. William Roberts Jr. & Associates  
16                                 6135 Park South Drive  
17                                 Charlotte, NC  
18          TAKEN BY:             Counsel for the Plaintiff  
19          REPORTED BY:          SOLANGE RUIZ-URIBE, Court Reporter

20                                 A. WILLIAM ROBERTS, JR., & ASSOCIATES  
21                                 Fast, Accurate & Friendly

22          Charleston, SC       Hilton Head, SC   Myrtle Beach, SC  
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                                   (828) 785-5699

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1 A. Correct.

2 Q. Okay. Even though Goodyear says it is  
3 defectively designed?

4 MR. BOTT: Object to form.

5 THE WITNESS: I'm not sure that -- where  
6 do they say it was defectively designed? There was  
7 never any recall of these tires, NHTSA never found  
8 anything defective.

9 BY MR. LYNCH:

10 Q. You don't think Goodyear believes these  
11 are defectively designed?

12 A. Not to the point where they -- that they  
13 felt that there was a defect that made them  
14 unreasonably dangerous to the point they would have  
15 to recall them. No.

16 Q. Okay. So you don't believe-- they may be  
17 defectively and may be unreasonably dangerous but  
18 not to the point of recall?

19 A. That's Goodyear's position and that's what  
20 I see in my analysis of the tires.

21 Q. All right. Two, the subject tire was  
22 appropriately designed, manufactured, tested and  
23 stands in compliance with the federal regulations  
24 and industry standards in government tires. I'm  
25 sorry. You say it's manufactured, but then they

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1       went back and remanufactured this tire with nylon  
2       cap plies, didn't they?

3           A. They did make some changes including an  
4       option nylon cap ply per some of the service  
5       conditions that they saw there tires were being  
6       used.

7           Q. But you don't believe that they  
8       necessarily needed to do that because you believe  
9       this tire was appropriately designed and  
10      manufactured. So why would they ever go back and  
11      redesign it?

12          A. Because of the changing conditions that  
13       they saw in certain applications. It doesn't mean  
14       in all applications but they saw, obviously saw a  
15       need to change it for certain -- it doesn't mean  
16       that, again, that in the vast majority of  
17       applications tires are perfectly fine.

18           They didn't -- I go back to it. They  
19       didn't recall them. If -- you know, I'm not a  
20       Goodyear employee but I have dealt with tire  
21       manufacturers enough, if they seriously thought  
22       there was an issue that made them concerned from a  
23       durability standpoint they would have recalled the  
24       tires. That's my experience.

25          Q. When you say this tire was properly

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1 stamped, is this where you're talking about you're  
2 disagreement with Lila?

3 A. No. It comes up more specifically toward  
4 the end. I will offer you there is no government  
5 requirement to stamp, you know, I'm talking about  
6 federal and industry standards governing tires as  
7 far as being appropriately stamped.

8 Q. Goodyear could certainly stamp a tire and  
9 put a born on date, beer does it and bread does it  
10 and other people do it, right?

11 A. So you want a second date. It already has  
12 one date so you want a second date now. Sure, they  
13 could put three or four dates on it.

14 Q. You think the average consumer knows how  
15 to read a DOT?

16 A. Anybody that wants to know the date of the  
17 tires are it's very easy for them to find out.  
18 Anybody can. Anybody can. And especially someone  
19 like Dandy Construction or more importantly Kerney  
20 Towing who was doing the actual maintenance on --  
21 the work on the tires.

22 They should know or they should be  
23 able to easily find out what the -- what the year of  
24 the manufacture of these particular tires, very  
25 easy. We wouldn't have to go very far out of this

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1 room to find information if we really want to know  
2 what the date was on the tire.

3 Q. You and I can do it, and you think the  
4 court reporter here knows how to read the date on  
5 the tire?

6 A. If she wanted to know and she wanted to  
7 take that responsibility other than letting her tire  
8 professional know.

9 BY MR. LYNCH:

10 Q. For the record, she said she doubted it?

11 A. She can find out. I would offer her to  
12 Google it or ask Siri even and you would easily come  
13 up with something.

14 Q. It's sort of hidden in the DOT code,  
15 right?

16 A. No. It's very easy to find. And I'll  
17 offer, just so you're aware, we haven't talked about  
18 it, but I will offer you surveys that I've been  
19 involved with, with thousands and thousands of  
20 tires, all different manufacturers around the world,  
21 there is no one, no one that puts that type of  
22 information on the sidewall of the tire.

23 Q. The subject tire experienced a detachment  
24 of portion of the tread and top belt. We talked  
25 about this entire --

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CERTIFICATE OF REPORTER

2

3 I, Solange Ruiz-Uribe, Notary Public for the State  
4 of North Carolina at Large, do hereby certify that the  
5 foregoing transcript is a true, accurate, and complete  
6 record.

7

8 I further certify that I am neither related to nor  
9 counsel for any party to the cause pending or interested  
in the events thereof.

10

11 Witness my hand, I have hereunto affixed my  
12 official seal this 31st day of May, 2019 at Charlotte,

13 Mecklenburg County, North Carolina.

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Solange Ruiz-Uribe  
My Commission expires  
March 7, 2022